

- Exhibit 1 – Share Holder Group Data

Actual Plaintiff(s) Full Name	Plaintiff Address	Shares	Options
Christopher Swedlow	844 E Ponderosa Drive Azusa, California 91702	15,000	
Christopher Coligado	6328 Albro Lane, Alexandria, VA 22312	398,740	
Daniel Gad	53 Plymouth Rd Great Neck, NY 11023	20,000	
Jayaprakash Srinivasan Aarthi Srinivasan	9105 Mossy Rock Ct, Bristow, VA-20136	551,979	
Thomas Carl Rabin	1427 Normandy Dr. Apt 4 Clearwater, FL 33756	11,563	
Anne Ingledew	#302, 11430 40 Ave, Edmonton, AB, Canada T6J0R5	100,900	
Darren Hunting	1520 Hammond Gate, Edmonton, AB, Canada	11,000	
Khanh L. Bui	7115 Meadow Hawk Court, Houston, TX 77041	69,890	
Robert Brower, Jr.	25 Sunderland Lane, Katonah, New York 10536	100,949	
Robert Brower, Sr.	P.O. Box 1627, Ocean View, DE 19970	70,750	
Alexandre Tazi	424 Av Jenkins Lachine, Qc H8S 0B5	56,865	
Edwin Howell Sioe Lie Howell	2170 Forest Drive Cumming, GA 30041	21,680	
Amira Yousuf Chowdhury	1415 Eldridge Pkwy, Apt 1838, Houston, Texas 77077	11,800	
John Arden Ahnefeldt	3639 Ellis St., Eau Claire, WI 54701	100,000	
Amit Somani Shital Mehta	1115 Penny Worth Dr., Sugarland, TX 77479	56,110	787,100
Jignesh Chandarana Krutika Chandarana	11131 Dunstan Hill Dr, Richmond, TX-77407	11,355	
Adam Shultz	115 Clover Ln. Janesville, WI 53548	201,919	
Total		1,810,500	787,100

- Exhibit 2 - Sept. 18, 2019 – McDermott Press Release.



NEWS RELEASE

For Immediate Release:
9/18/2019

McDermott Statement

HOUSTON, Sept. 18, 2019 /PRNewswire/ -- McDermott International, Inc. (NYSE:MDR) routinely hires external advisors to evaluate opportunities for the Company. The Company is taking positive and proactive measures, as we have done in the past, intended to improve its capital structure and the long-term health of its balance sheet.

About McDermott

McDermott is a premier, fully integrated provider of technology, engineering and construction solutions to the energy industry. For more than a century, customers have trusted McDermott to design and build end-to-end infrastructure and technology solutions to transport and transform oil and gas into the products the world needs today. Our proprietary technologies, integrated expertise and comprehensive solutions deliver certainty, innovation and added value to energy projects around the world. Customers rely on McDermott to deliver certainty to the most complex projects, from concept to commissioning. It is called the "One McDermott Way." Operating in over 54 countries, McDermott's locally focused and globally-integrated resources include approximately 32,000 employees, a diversified fleet of specialty marine construction vessels and fabrication facilities around the world. To learn more, visit www.mcdermott.com.

Forward-Looking Statements

In accordance with the Safe Harbor provisions of the Private Securities Litigation Reform Act of 1995, McDermott cautions that statements in this press release which are forward-looking, and provide other than historical information, involve risks, contingencies and uncertainties that may impact McDermott's actual results of operations. These forward-looking statements include, among other things, statements about measures being taken with respect to the Company's capital structure and balance sheet. Although we believe that the expectations reflected in those forward-looking statements are reasonable, we can give no assurance that those expectations will prove to have been correct. Those statements are made by using various underlying assumptions and are subject to numerous risks, contingencies and uncertainties, including, among others: adverse changes in the markets in which we operate or credit markets, our inability to successfully execute on contracts in backlog, changes in project design or schedules, the availability of qualified personnel, changes in the terms, scope or timing of contracts, contract cancellations, change orders and other modifications and actions by our customers and other business counterparties, changes in industry norms and adverse outcomes in legal or other dispute resolution proceedings. If one or more of these risks materialize, or if underlying assumptions prove incorrect, actual results may vary materially from those expected. For a more complete discussion of these and other risk factors, please see McDermott's annual and quarterly filings with the Securities and Exchange Commission, including its annual report on Form 10-K for the year ended December 31, 2018 and subsequent quarterly reports on Form 10-Q. This press release reflects management's views as of the date hereof. Except to the extent required by applicable law, McDermott undertakes no obligation to update or revise any forward-looking statement.

Contacts:

Investor Relations
Scott Lamb
Vice President, Investor Relations
+1 832 513 1068

- Exhibit 3 –Sep. 20, 2019.



NEWS RELEASE

For Immediate Release:

9/20/2019

McDermott to Explore Strategic Alternatives for Lummus Technology

Company recently received unsolicited approaches for Lummus Technology with valuation exceeding \$2.5 billion
HOUSTON, Sept. 20, 2019 /PRNewswire/ -- McDermott International, Inc. (NYSE: MDR) today announced it recently received unsolicited approaches to acquire all or part of Lummus Technology, McDermott's industry-leading technology business, with valuation exceeding \$2.5 billion. Based on the receipt of these approaches, McDermott is exploring strategic alternatives to unlock the value of Lummus Technology while maintaining the strategic rationale of engineering, procurement and construction (EPC) pull-through.

McDermott's Lummus Technology is a leading licensor of proprietary petrochemicals, refining, gasification and gas processing technologies, and a supplier of proprietary catalysts and related engineering. With a heritage spanning more than 100 years, encompassing approximately 3,100 patents and patent applications, Lummus Technology provides one of the industry's most diversified technology portfolios to the hydrocarbon processing sector.

"Lummus is an excellent business, with incredibly impressive employees, that has earned a reputation for expertise, innovation and reliability in the refining and petrochemical industries," said David Dickson, President and Chief Executive Officer of McDermott. "The process of exploring strategic alternatives is part of our ongoing efforts intended to improve McDermott's capital structure, and we plan to use the proceeds from any transaction involving Lummus Technology to strengthen our balance sheet. While Lummus is an important business within McDermott, we have decided to undertake a process to fully realize its strategic and financial value."

Separately, McDermott's previously announced processes to sell the remaining portion of its pipe fabrication business and its industrial storage tank business are ongoing.

McDermott has retained Evercore as the lead advisor on the strategic alternatives process for Lummus Technology.

- Exhibit 4 – Sep. 24, 2019



NEWS RELEASE

For Immediate Release:
9/24/2019

McDermott Awarded FEED Contract for Shwe Phase 3 Development

- Awarded for FEED design competition by POSCO INTERNATIONAL Corporation
- Scope will be completed by McDermott's Center of Engineering Excellence in Kuala Lumpur
- Award builds on McDermott's work on earlier phases of the Shwe gas field development
HOUSTON, Sept. 24, 2019 /PRNewswire/ -- McDermott International, Inc. (NYSE: MDR) announced that it was awarded a sizeable* front-end engineering design (FEED) contract by POSCO INTERNATIONAL Corporation for the Shwe Phase 3 gas field development, located offshore Myanmar.

"This award is a testament to McDermott's excellent FEED and EPCIC project delivery capability on large central production platform facilities. We look forward to continuing to work with POSCO INTERNATIONAL Corporation to meet Myanmar's growing energy demands," said Ian Prescott, Senior Vice President, Asia Pacific.

The Shwe field is approximately 44 miles (70 kilometers) offshore Myanmar. The scope of work includes FEED services for a new compression platform, a bridge link and modifications in existing platform.

Commencing in Q3 2019, the work will be undertaken in McDermott's Center of Engineering Excellence in Kuala Lumpur and is scheduled for completion in the second quarter 2020.

The award will be reflected in McDermott's third quarter 2019 backlog.

* - McDermott defines a sizeable contract as between USD \$1 million and USD \$50 million.

- Exhibit 5 – Press Release Oct 22, 2019



NEWS RELEASE

For Immediate Release:
10/22/2019

McDermott Awarded Large Contract for Mixed Feed Cracker for the Amiral Complex to be located in Saudi Arabia

- McDermott's Lummus Technology is the master licensor of multiple licensed units
- Scope includes license, basic engineering package, extended basic engineering, training, technical services and supply of proprietary equipment for what will be one of the world's largest mixed feed crackers
- Award will be reflected in McDermott's Q3 backlog

HOUSTON, Oct. 22, 2019 /PRNewswire/ -- McDermott International, Inc. (NYSE: MDR) announced it has been awarded a large* contract by Saudi Aramco and Total Raffinage Chimie (Total) to provide licenses, basic engineering package, extended basic engineering, training, technical services and supply of proprietary equipment for what will be one of the world's largest mixed feed crackers.

As part of the contract, McDermott's Lummus Technology will provide licensing and engineering services for its olefins technology, low pressure recovery (refinery off-gas recovery and treating), pygas hydrotreating, CDMtbe® Methyl Tertiary Butyl Ether (MTBE) (production technology using catalytic distillation), CDIB® (back cracking of MTBE to produce high purity isobutylene and methanol) and the BASF NMP (N-methylpyrrolidone-based butadiene extraction process). In addition, Lummus will provide its proprietary Short Residence Time (SRT®) heaters.

"Lummus has a reputation for innovation and reliability in the market and this award strengthens our industry-leading ethylene position by taking on the role of master licensor for multiple licensed units," said Leon de Bruyn, Senior Vice President, Technology. "The award is also a testament of our long-standing relationship with Aramco and Total and our commitment to the Kingdom of Saudi Arabia."

Linh Austin, Senior Vice President, Middle East and North Africa, added that the award further demonstrates McDermott's ability to support the Kingdom's stated objective of increasing petrochemical production.

"This award sets the foundation for Saudi Aramco and Total to deliver a world-scale integrated refinery and petrochemicals complex," Austin said.

McDermott's Lummus Technology is a leading licensor of proprietary petrochemicals, refining, gasification and gas processing technologies, and a supplier of proprietary catalysts and related engineering. With a heritage spanning more than 100 years, encompassing approximately 3,400 patents and patent applications, Lummus Technology provides one of the industry's most diversified technology portfolios to the hydrocarbon processing sector.

The award will be reflected in McDermott's third quarter 2019 backlog.

* McDermott defines a large contract as between USD \$50 million and USD \$250 million.

- Exhibit 6 – October 21, 2019



NEWS RELEASE

For Immediate Release:

10/21/2019

McDermott International Enters into Agreement for up to \$1.7 Billion of New Financing

- New facility underscores strong lender support for McDermott
- Sale process continues for Lummus Technology

HOUSTON, Oct. 21, 2019 /PRNewswire/ -- McDermott International, Inc. (NYSE: MDR) (collectively with its subsidiaries, the "Company") today announced that it has entered into an agreement (the "Agreement") with certain of its secured lenders (the "Lenders") under which the Company will have access to up to \$1.7 billion of additional financing, including letter of credit capacity. Under the terms of the Agreement, McDermott will have immediate access to \$650 million of financing comprised of \$550 million under a term loan facility and \$100 million under a letter of credit facility, before reduction for related transaction fees and expenses.

The Company expects to utilize the amounts available under the Agreement to finance working capital and support the issuance of required performance guarantees on new projects.

"This new credit agreement is a continued signal from our lenders that they support McDermott, our underlying business, growth strategy and ability to achieve a long-term balance sheet solution," said David Dickson, President and Chief Executive Officer of McDermott. "The Agreement provides near-term liquidity for the Company to manage working capital and provide performance guarantees on expected new awards. We remain focused on serving our customers' needs, supporting our dedicated employees and maintaining our valued relationships with our subcontractors, suppliers and other business counterparties, all as part of our efforts to enhance our position as a premier, fully integrated provider of technology, engineering and construction solutions to the energy industry."

McDermott continues to pursue the previously announced strategic alternatives process for Lummus Technology and the sale process for the remaining portion of the pipe fabrication business. McDermott has decided to terminate its previously announced sale process for its industrial storage tank business.

The Company's ability to access the remaining amount of financing under the Agreement is subject to various conditions that are at the discretion of the Lenders. Those conditions are detailed in the Form 8-K that the Company filed with the U.S. Securities and Exchange Commission today (the "Form 8-K").

McDermott also announced that it is withdrawing its previously stated guidance for full-year 2019. Separately, the presentation material used by the Company in discussions with the Lenders regarding the new financing is included as an exhibit to the Form 8-K.

Kirkland & Ellis LLP is serving as legal counsel to McDermott in connection with the new financing and related matters, Evercore is serving as financial advisor and AP Services, LLC, an affiliate of AlixPartners, is serving as operational advisor. Barclays is acting as lead arranger on the financing.

Exhibit 7 – October 21, 2019 SEC 8K-Filing

Additional Disclosures – EBITDA & Free Cash Flow Reconciliations⁵

\$ in millions

Reconciliation of Non-GAAP to GAAP financial measures

\$ in millions	Semi-Annual					Annual			
	Q3'19	Q4'19	2H'19	1H'20	2H'20	TY'19	TY'20	TY'21	TY'22
Net income (loss) attributable to common stockholders	\$(293)	\$(53)	\$(345)	\$(75)	\$182	\$(561)	\$107	\$465	\$743
Add:									
Depreciation & amortization	65	65	130	108	117	267	224	243	238
Interest expense, net	101	102	203	223	243	395	465	450	394
Income tax expense	28	108	136	63	50	66	112	87	274
Accretion and dividends on redeemable preferred stock	13	13	26	26	26	54	53	54	55
EBITDA ^{1,2}	\$(66)	\$235	\$149	\$344	\$617	\$220	\$961	\$1,297	\$1,704
EBITDA	\$(85)	\$235	\$149	\$344	\$617	\$220	\$961	\$1,297	\$1,704
Adjustments:									
Transaction costs	20	(5)	15	-	-	30	-	-	-
Restructuring and integration costs	24	11	35	7	7	123	13	-	-
Loss on sale of APP	-	-	-	-	-	101	-	-	-
Adjusted EBITDA ^{1,3}	\$(42)	\$241	\$199	\$351	\$624	\$474	\$975	\$1,297	\$1,704
Cash flows from operating activities ⁴	\$(33)	\$(566)	\$(599)	\$(15)	\$220	\$(1,049)	\$205	\$905	\$1,072
Capital expenditures	(53)	(59)	(112)	(158)	(99)	(145)	(257)	(219)	(235)
Free cash flow ^{4,5}	\$(86)	\$(626)	\$(711)	\$(172)	\$121	\$(1,194)	\$62	\$686	\$837

- 1) We define EBITDA as net income plus depreciation and amortization, interest expense, net, accretion of and dividends on redeemable preferred stock and provision for income taxes. We define adjusted EBITDA as EBITDA adjusted to exclude significant, non-recurring transactions, both gains and charges, to our operating income. We have included EBITDA and adjusted EBITDA disclosures in this presentation because EBITDA is widely used by investors for valuation and comparing our financial performance with the performance of other companies in our industry and because adjusted EBITDA provides a consistent measure of EBITDA relating to our underlying business. Our management also uses EBITDA and adjusted EBITDA to monitor and compare the financial performance of our operations.
- 2) We define free cash flow as cash flows from operations less capital expenditures. We believe investors consider free cash flow as an important measure, because it generally represents funds available to pursue opportunities that may enhance stockholder value, such as making acquisitions or other investments. Our management uses free cash flow for that reason.
- 3) EBITDA and adjusted EBITDA do not give effect to the cash that we must use to service our debt or pay our income taxes, and thus do not reflect the funds actually available for capital expenditures, dividends or various other purposes. In addition, our presentation of EBITDA, adjusted EBITDA, and free cash flow may not be comparable to similarly titled measures in other companies' reports. You should not consider EBITDA, adjusted EBITDA, and free cash flow in isolation from, or as a substitute for, net income or cash flow measures prepared in accordance with U.S. GAAP.
- 4) Includes the following cash tax figures: \$19mm in Q1'19; \$45mm in Q2'19; \$24mm in Q3'19; \$6mm in Q4'19; (\$9)mm in Q1'20; \$28mm in Q2'20; \$18mm in Q3'20; \$22mm in Q4'20; \$142mm in TY'21
- 5) All amounts have been rounded to the nearest million. Individual line items may not sum to totals as a result of rounding.



Note: Figures shown prior to impact of new superpriority financing

Highly Confidential

EVERCORE

29

- Exhibit 8

8. In early September 2019, AlixPartners was retained by McDermott to assist with liquidity management and review certain construction projects that were incurring significant losses and determine the impact of such losses on McDermott's business plan. Almost immediately, McDermott asked AlixPartners to **pivot** to contingency planning, as it became clear that liquidity was an acute issue. My personal involvement began thereafter in late September because McDermott potentially needed an officer to help lead a comprehensive restructuring. At that time, McDermott's efforts to raise additional liquidity through a sale of its "Tank" and Pipe Fabrication assets or a junior capital raise were faltering, and McDermott's vendor base was beginning to resist efforts to further stretch account payable balances. While McDermott had significant amounts of cash on their balance sheet, much was trapped within McDermott's joint

- Exhibit 9 – Castellano’s first day declaration

23. On December 1, 2019, after significant deliberation and discussion with the secured lenders on whether to fund the second **tranche** under a debtor-in-possession financing facility rather than on an out-of-court basis, McDermott gained access to the second **tranche** of funding under the Superpriority Facility providing an incremental \$250 million term loan facility (\$229 million after fees) and a \$100 million letter of credit facility. In connection with this funding, the secured lenders stated that they did not expect to fund any additional amounts on an out-of-court basis. As such, McDermott’s liquidity would drive the timing of any potential chapter 11 filing.

- Exhibit 10 – CEO’s first day declaration, David Dickson.

had expected to obtain. We began to win new projects at a prodigious rate—as reflected in our current project revenue backlog that as of Q3 2019 exceeded a record-setting \$20 billion.

14. With our successes in winning new business has come increased near-term financial obligations. As is common in our industry, each of these new projects will require us to post new letters of credit (“LC”) to backstop our performance obligations. Each also will require significant front-end investments in engineering and fabrication, among other things. These demands have put tremendous stress on our challenging liquidity position.

- Exhibit 11

MCDERMOTT

WHO WE ARE WHAT WE DO MARKETS

12/23/2019

McDermott and Chiyoda Announce First Liquid from Cameron LNG Train 2

[Description](#) [HTML](#) [PDF](#)

12/18/2019

McDermott, Chiyoda and Zachry Group Announce First Cargo from Freeport LNG Train 2

[Description](#) [HTML](#) [PDF](#)

12/17/2019

McDermott Awarded Technology Contract by Naftna Industrija Srbije in Serbia

[Description](#) [HTML](#) [PDF](#)

12/13/2019

McDermott Receives Continued Listing Standard Notice from NYSE

[Description](#) [HTML](#) [PDF](#)

12/12/2019

McDermott Awarded Technology Contract for Project Traveler Grassroots Alkylate Production Facility in Texas

[Description](#) [HTML](#) [PDF](#)

12/09/2019

Freeport LNG Train 1 Begins Commercial Operation

[Description](#) [HTML](#) [PDF](#)

12/09/2019

McDermott Awarded EPC Company of the Year in India

[Description](#) [HTML](#) [PDF](#)

12/06/2019

McDermott, Chiyoda and Zachry Group Announce First Liquid from Freeport LNG Train 2

Exhibit 12 – Exhibit F Valuation Analysis (page 300 to 304) of the Disclosure Statement.

Page 300 states the following:

“.....Further, with the consent of the Debtors, Evercore has relied upon and assumed, and expresses no view as to, the accuracy, completeness, and fairness of such financial and other information. At the direction of the Debtors, Evercore did not attempt to independently audit or verify such information, nor did it seek or perform an independent appraisal of the assets or liabilities of the Debtors or the Reorganized Debtors.”

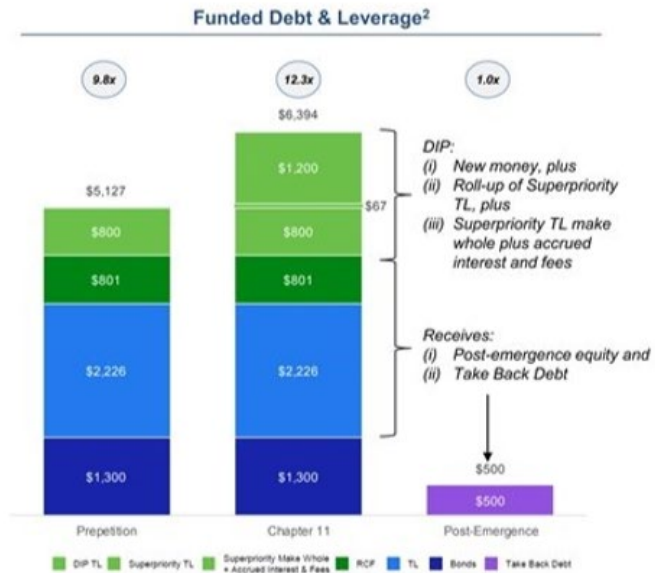
Fair and transparent analysis (for McDermott) is shown in SEC filing “Tender offer statement by Third Party” filed on 03/29/2018 and available on <http://www.mcdermott-investors.com/sec-filings/default.aspx>. Page 120 to 156 of 434 shows peer group analysis and discounted cash flow analysis by three independent firms (Goldman Sachs & Co., LLC, Greenhill & Co., LLC (“Greenhill”) and Centerview. These three firms (hired separately by McDermott and CB&I, at the time of merger) provide detailed view of analysis methodology used.

- Exhibit 13

Summary Capitalization

(\$ in millions)

- Prepetition capital structure:
 - ▶ Funded debt: \$5.1 billion
 - Includes \$800 million of Superpriority Term Loan
- Capital structure pro forma for DIP Facility¹:
 - ▶ Funded debt (incl. DIP draw and rollup): \$6.4 billion
 - ▶ Funded DIP Term Loan:
 - DIP Term Loan: \$1,200 million, plus
 - Roll-up of Superpriority Term Loan: \$800 million
 - Roll-up of Superpriority make whole plus accrued interest and fees: \$67 million
 - ▶ DIP to be repaid in cash at exit with proceeds from Tech sale
- Post-emergence, the only funded debt will be the \$500 million of Take Back Debt, resulting in substantial deleveraging of the Company's balance sheet
 - ▶ Prepetition secured debt to receive:
 - \$500 million of Take Back Debt, and
 - Post-emergence equity
 - ▶ Prepetition bond treatment TBD



Given the quantum of funded leverage, the need for L/C and surety credit support to achieve the business plan, equitization of prepetition funded obligations is required to support the business

¹ Based on proposal received from secured lenders but not yet approved by the Company
² Leverage equal to funded debt divided by 2020 Adj. EBITDA of \$521 million

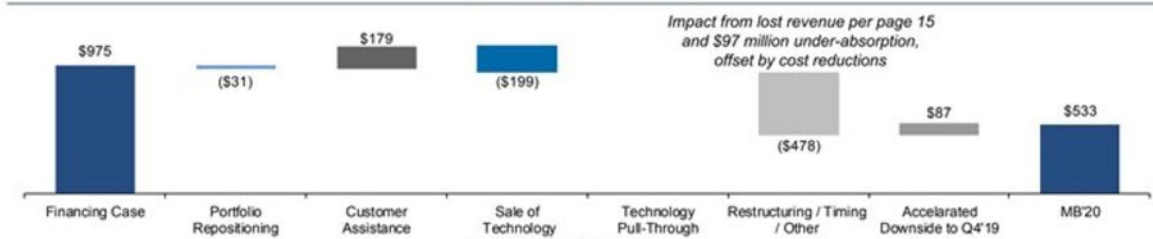
- Exhibit 14

Executive Summary (continued)

(\$ in millions)

2020-2021 Bridge to the Financing Case – Adjusted EBITDA

- Adjusted EBITDA in the business plan in 2020 and 2021 is \$441 and \$632 million lower, respectively, vs. the Financing Case
 - Forecast adjusted EBITDA in 2020 and 2021 is impacted by the loss and deferral of new orders and increased cost of projects delays as a result of the Chapter 11 case
 - Adjusted EBITDA is further impacted by the sale of Tech, loss of associated pull-through, and the repositioning to a narrower, risk-mitigated portfolio

2020E Adj. EBITDA Bridge

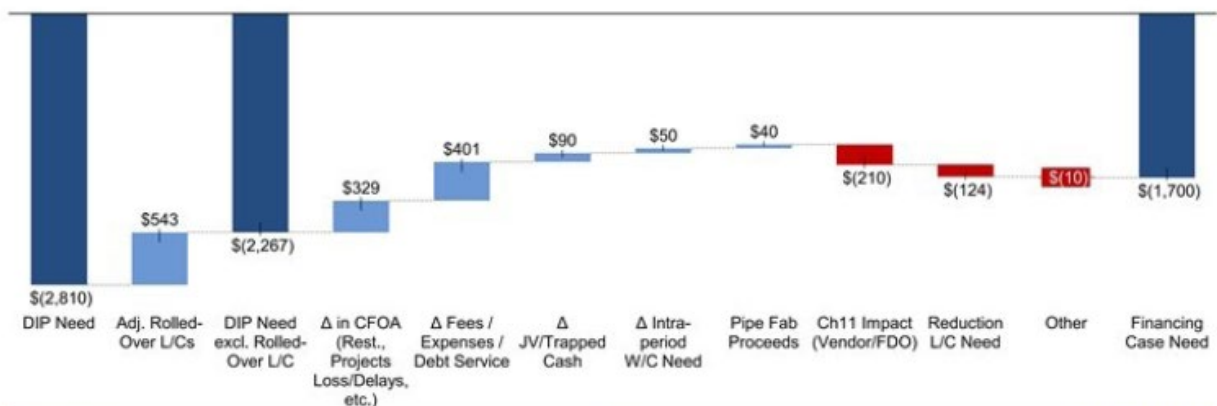
- Exhibit 15

Bridge Analysis – Financing Need vs DIP Case

(\$ in millions)

The. DIP facility (including roll-up) is ~\$2.8 billion compared to the \$1.7 billion financing need in the Financing Case

- Financing case did not include roll-up into DIP of existing \$543 million L/C capacity consisting of (i) \$371 million of new and incremental L/C commitments; and (ii) \$172 million rolled pre-petition cash collateralized L/C capacity
- Driver of increased funding need vs. Financing Case
 - ▶ Reduction of \$329 million in CFOA vs. Financing Case due to impact of current situation (loss/delay of project, slippage etc.)
 - ▶ Incremental incurred and projected transaction expenses, interest and chapter 11 related professional fees of \$401 million vs. Financing Case preliminary estimate of \$200 million
 - ▶ Higher than projected in-country cash of \$90 million and increased minimum liquidity/working capital need of \$50 million
- Drivers of reduced funding need vs. Financing Case
 - ▶ Financing Case did not include impact of automatic stay / FDO relief relative to vendors estimated at \$210 million
 - ▶ Reduction of \$124 million of L/C need compared to the \$324 million incremental L/C need at trough in the Financing Case



- Exhibit 16 – Section X of disclosure

X. Do the Debtors recommend voting in favor of the Plan?

Yes. The Debtors believe that the Plan provides for a larger distribution to the Debtors' creditors and equity holders than would otherwise result from any other available alternative. The Debtors believe that the Plan, which contemplates a significant deleveraging of the Debtors' balance sheet and enables them to emerge from chapter 11 expeditiously, is in the best interest of all holders of Claims or Interests, and that any other alternatives (to the extent they exist) fail to realize or recognize the value inherent under the Plan.

- Exhibit 17 – Superpriority Agreement (8K as of October 21, 2019)

“Section 7.16 Business Plan Milestones

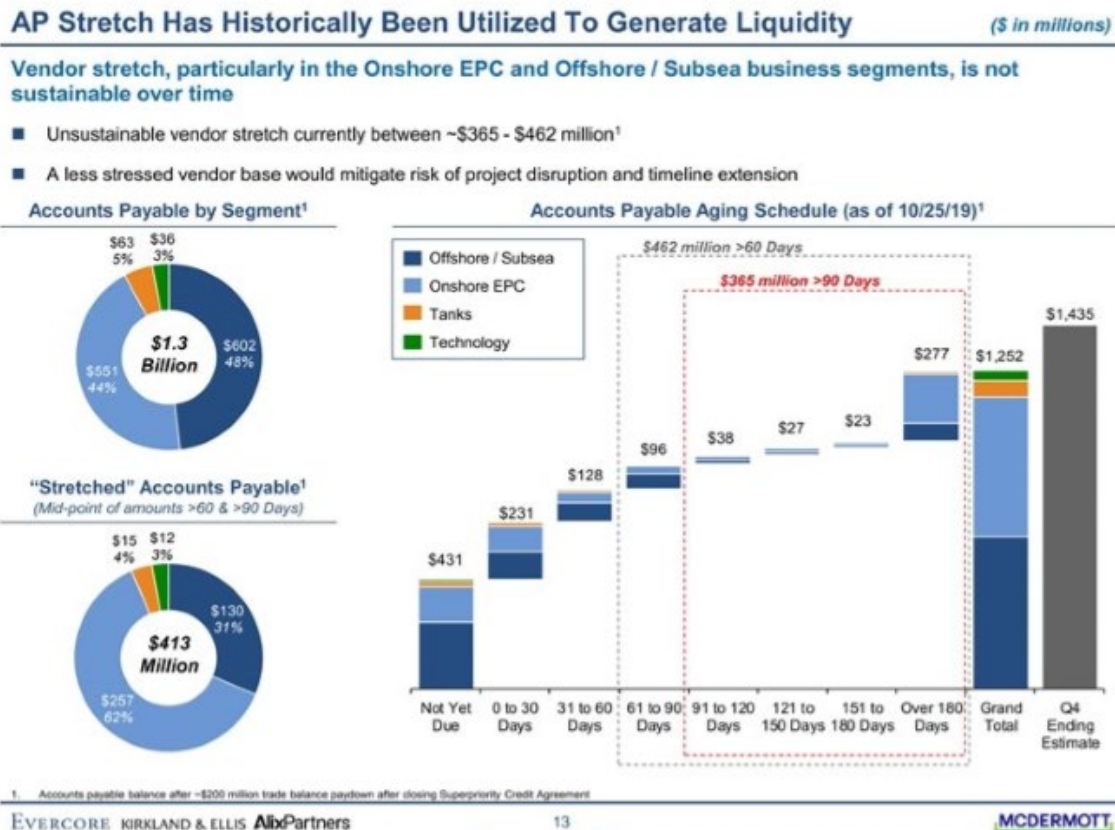
(c) by no later than November 11, 2019, the Parent’s senior management shall have delivered to the Parent’s board of directors, and the Parent shall have delivered to Centerview and FTI, a detailed report (the “Business Plan Report”) describing (i) analysis (including applicable tax analysis) of the financial profile of Parent and its Subsidiaries following, and after giving effect to, the funding and issuances of the Term Loans on each of the Tranche B Funding Date, Tranche C Funding Date and Tranche D Funding Date, and any potential divestitures (including the Technology Business Sale) or other transactions to deleverage the Parent and its Subsidiaries; (Page 730 of 886 of Superpriority Agreement 8K)

(f) by no later than November 29, 2019, the Supermajority Lenders shall have approved the Business Plan Report previously delivered by the Parent prior to November 11, 2019; (Page 731 of 886 of Superpriority Agreement 8K)”

- Exhibit 18 – Stressed Vendor Payments:

Chief Transformation Officer John Castellano discussed vendor payment on first day hearing. Audio from 1:56 min to 1:58 min of January 23, 2020 first day hearing audio file. Castellano stated “We owe our vendors right now roughly about \$1.2B dollars. We are requesting relief in the vendor motion for about 800M dollars....”

Slide below (page 471 of 607; January 21, 2020 SEC Filed 8K). Bullet 1 shows “Unsustainable vendor stretch currently between 365 – 462 million”.



- Exhibit 19 – Cash liquidity held by company as of December 31, 2019. Per page 66 of 505, of company filed full year 2019 10K on February 28nd, 2020 to SEC, the company had \$1.2B of cash (<http://www.mcdermott-investors.com/sec-filings/default.aspx>)

“Cash, Cash Equivalents and Restricted Cash

As of December 31, 2019, we had \$1.193 billion of cash, cash equivalents and restricted cash, as compared to \$845 million as of December 31, 2018. Approximately \$213 million of our cash and cash equivalents as of December 31, 2019 was within our variable interest entities (“VIEs”) associated with our joint venture and consortium arrangements, which is generally only available for use in our operating activities when distributed to the joint venture and consortium participants. “

- Exhibit 20 – Opinion on the financial statement (Full Year 2019 10K) by Ernst & Young.

Item 8. FINANCIAL STATEMENTS AND SUPPLEMENTARY DATA

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

Page 88 of 505 states the following:

“Auditing management’s estimate of the progress towards completion of its projects was complex and subjective because of the considerable judgment required to evaluate management’s determination of the forecasted costs to complete its fixed price contracts as future results may vary significantly from past estimates due to changes in facts and circumstances. In addition, auditing the Company’s measurement of variable consideration was also complex and highly judgmental as increases to transaction prices for approved and unapproved change orders, claims, incentives and bonuses, and reductions to transaction price for liquidated damages or penalties can have a material effect on the amount of revenue recognized and require significant estimation by management regarding various possible outcomes.”